

Annual 47 C.F.R. § 64.2009fe) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 21, 2019

Name of companies covered by this certification: Call Catchers, Inc., and GoDaddy.com LLC.

Form 499 Filer ID: 826655 and 831921

Name of signatory: Gino Capozzi

Title of signatory: Telecommunications Compliance Officer

I, Gino Capozzi, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code.

Signed:



Gino Capozzi, Telecommunications Compliance Officer

Attached Accompanying Statement

The following are the measures put in place by the Call Catchers, Inc. and GoDaddy.com LLC (collectively referred to herein as "the Company") to protect CPNI.

The following items (1) to (18) are how the Company guards CPNI in the form of selling CPNI for profit or marketing purposes by the Company to its sister companies, subsidiaries, parent companies or joint venture entities but without authorization by the owner. In the event that the Company was to sell or share CPNI with its affiliated entities for marketing or profit purposes, it would strictly abide by the following policies in compliance with FCC rules as outlined in section 222 of the Communications Act of 1934 as amended, 47 U.S.C. 222 (47 C.F.R. S: 64.2001 to 64.2011 et seq.).

- (1). The Company does not enable use, disclosure or permit access to CPNI for any marketing purposes to any persons, entities, parties outside of the Company without the specific consent of the customer that owns the CPNI data.
- (2). A Corporate Officer has been named as the CPNI Compliance Officer and will certify annually compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
- (3). If the Company wishes to share CPNI with any subsidiaries or parent companies of the Company and the customer and the customer has not provided consent for such use where such consent is required, the Company will secure the consent of the customer prior to sharing that CPNI data with subsidiaries or parent companies of the Company.
- (4). The Company maintains records of compliance for at least the minimum period as required by FCC rules and regulations.
- (5). The Company has a supervisory review and approval process in place for any proposed outbound marketing request for CPNI.
- (6). The Company does not and will not utilize, disclose or permit access to CPNI data to identify or track customers that call competing service providers.
- (7). If the Company requires customer consent for utilizing, disclosing or permitting access to CPNI data, the Company will obtain consent through written, oral or electronic methods. Without such consent, the Company only uses CPNI in lawful ways, such as for billing and collecting of service rendered, protecting the Company's rights and property, or providing customer information required by a PSAP.

- (8). The Company has a policy in which any customer approvals obtained for the use, disclosing or utilization of CPNI data will remain in effect until the customer revokes or limits such approval or disapproval.
- (9). All employees of the Company who have access to CPNI are trained on the regulations concerning the disclosure of CPNI and the consent requirements for use.
- (10). The Company has a notification process in place to alert law enforcement, the FCC and affected customers in the event of a CPNI breach.
- (11). The Company does not enable use, disclosure or permit access to CPNI for any marketing purposes to any persons, entities, parties outside of the Company without the specific consent of the customer that owns the CPNI data.
- (12). If the Company wishes to share CPNI with any subsidiaries or parent companies of the Company and the customer only subscribes to only 1 category of service offered by the Company, the Company will secure the consent of the customer prior to sharing that CPNI data with subsidiaries or parent companies of the Company.
- (13). The Company has a policy in which any customer approvals obtained for the use, disclosing or utilization of CPNI data will remain in effect until the customer revokes or limits such approval or disapproval.
- (14). Prior to any solicitation of the customer for approval for use of CPNI, the Company provides notification to the customer of the customer's rights to restrict use of, disclosure of, and access to that customer's CPNI.
- (15). In cases where the Company requests CPNI release requests from the customer, the Company includes the following in its **"Consent of Notice"**
- i. Sufficient information to enable the customer to make an informed decision as to whether to permit the Company to use, disclose or permit access to, the customer's CPNI.
 - ii. Statement declaring that the customer has a right, and that the Company has the duty, under federal law, to protect the confidentiality of CPNI.
 - iii. Specific statement on the types of information that constitute CPNI (**as defined in 64.2001**) and the specific entities that will receive the CPNI, describing the purposes for which CPNI will be used, and inform the customer of his or her right to

disapprove those uses, and deny or withdraw access to CPNI at any time.

- iv. Statement advising the customer of the steps the customer can take in order to grant or deny access to CPNI, and clear statement that a denial of approval will not affect the provision of any services to which the customer subscribes. The Company also provides a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI. The Company's notification will be comprehensible and not be misleading.
- iv. In cases where the Company utilizes written notification, the notice will be clear, legible, sufficiently large type and be placed in an area so as to be readily apparent to a customer.
- v. In the event that the notification is to be translated into another language, then all portions of the Company's notification will be translated into that language.
- vi. VII. The notification will state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from the Company is valid until the customer affirmatively revokes or limits such approval or denial.
- vii. The Company's solicitation for approval will state the customer's CPNI rights.

(16). All of the Company's notices specific to Opt-Out option will be provided via electronic or written notification. The Company will not utilize purely oral notification.

(17). In terms of the Company's Opt-in method, the Company will provide notification to obtain opt-in approval through oral, written or electronic methods, with all such methods complying with applicable items listed prior in this attachment.

(18.) In One-Time Use of CPNI, the customer recognizes that it may use oral notices to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether the Company uses opt-out or opt-in approval based on the nature of the contact. However, the Company will not

utilize oral consent and as such, will utilize either written or electronic notification and consent methods.